

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LOGAN PAUL,

Plaintiff,

v.

**STEPHEN FINDEISEN AND
COFFEE BREAK PRODUCTIONS, LLC
d/b/a COFFEEZILLA**

Defendants,

Civil Action No.: 5:24-cv-00717

**DEFENDANT STEPHEN FINDEISEN'S RESPONSES AND OBJECTIONS
TO PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION**

TO: Plaintiff Logan Paul, by and through his attorneys of record, Andrew C. Phillips and Shannon B. Timmann; MEIER WATKINS PHILLIPS PUSCH, LLP, 919 18th Street NW, Suite 650, Washington, DC 20006, Jeffrey A. Neiman and Jason L. Mays; MARCUS NEIMAN RASHBAUM & PINEIRO, LLP, 100 SE 3rd Ave., Suite 805, Ft. Lauderdale, Florida 33394, and Ricardo G. Cedillo; DAVIS, CEDILLO & MENDOZA, INC., 755 E. Mulberry Ave., Suite 250, San Antonio, Texas 78212

Pursuant to Federal Rule of Civil Procedure 26 and 36, Defendant Stephen Findeisen serves these Responses and Objections to Plaintiff's First Set of Requests for Admissions.

Dated: July 15, 2025.

Respectfully submitted,

DAVIS & SANTOS, PLLC

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*Attorneys for Defendants Stephen Findeisen
and Coffee Break Productions, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, the foregoing document was served on all counsel of record as follows:

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Shannon B. Timmann (<i>Pro Hac Vice</i>)	_____	CMRRR
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Attorneys for Plaintiff Logan Paul

/s/ Rachel Garza

Rachel Garza

**STEPHEN FINDEISEN'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 1: Admit that you published the video titled "Logan Paul's Scam Isn't Over" on the YouTube platform on June 30, 2023.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 2: Admit that you published the video titled "Logan Paul's Refund" on the YouTube platform on January 5, 2024.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 3: Admit that you published a post on "X" (formerly Twitter) on June 29, 2023 that stated, "Logan Paul really is the type of dude to thank you when you expose his scam, then block you when you remind him to pay up."

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 4: Admit that you are not aware of any evidence suggesting that Plaintiff ever sold any Zoo Tokens.

OBJECTION: Responding Party objects to this request on the grounds that it is vague and ambiguous, in particular because it does not distinguish between direct and indirect sales of Zoo Tokens.

RESPONSE: Subject to and without waiving the foregoing objection, Deny.

REQUEST FOR ADMISSION NO. 5: Admit that Luciano Schippelliti told you on September 22, 2022 that his perception was that Plaintiff and Jeff Levin truly did want the CryptoZoo project to succeed.

OBJECTION: Responding Party objects to this request as being taken out of its full context. Responding Party refers to D04750 for a full and complete expression of its terms, which includes the following: "So it looks like they truly do want the project to succeed. (obv it could be just to protect reputation, but know knows, he seemed genuine about it)."

REQUEST FOR ADMISSION NO. 6: Admit that your December 20, 2022 YouTube video titled, "The Biggest Fraud in Logan Paul's Scam," had been viewed 5,794,503 times as of April 18, 2025, as reflected in D 005035.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 7: Admit that you earned \$27,491.57 in revenue from YouTube for your December 20, 2022 YouTube video titled, “The Biggest Fraud in Logan Paul’s Scam” as of April 18, 2025, as reflected in D 005039.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 8: Admit that your December 23, 2022 YouTube video titled, “Ending Logan Paul’s Biggest Scam,” had been viewed 8,457,676 times as of April 18, 2025, as reflected in D 005040.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 9: Admit that you earned \$50,385.61 in revenue from YouTube for your December 23, 2022 YouTube video titled, “Ending Logan Paul’s Biggest Scam” as of April 18, 2025, as reflected in D 005044.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 10: Admit that your December 16, 2022 YouTube video titled, “Investigating Logan Paul’s Biggest Scam,” had been viewed 10,778,121 times as of April 18, 2025, as reflected in D 005030.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 11: Admit that you earned \$47,175.98 in revenue from YouTube for your December 16, 2022 YouTube video titled, “Investigating Logan Paul’s Biggest Scam” as of April 18, 2025, as reflected in D 005034.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 12: Admit that your June 30, 2023 YouTube video titled, “Logan Paul’s Scam Isn’t Over,” had been viewed 6,030,951 times as of April 18, 2025, as reflected in D 005045.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 13: Admit that you earned \$16,726.38 in revenue from YouTube for your June 30, 2023 YouTube video titled, “Logan Paul’s Scam Isn’t Over” as of April 18, 2025, as reflected in D 005049.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 14: Admit that your January 5, 2024 YouTube video titled, “Logan Paul’s Refund,” had been viewed 5,429,533 times as of April 18, 2025, as reflected in D 005026.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 15: Admit that you earned \$19,038.19 in revenue from YouTube for your January 5, 2024 YouTube video titled, “Logan Paul’s Refund” as of April 18, 2025, as reflected in D 005029.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 16: Admit that you did not attempt to contact Plaintiff directly by telephone, text message, or email to discuss CryptoZoo until December 24, 2022.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 17: Admit that you knew prior to publishing your three-part YouTube series on CryptoZoo that Zach Kelling had a criminal record.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 18: Admit that you did not inform Jeffrey Levin that you were recording your telephone call with him that you featured in your December 16, 2022 YouTube video, “Investigating Logan Paul’s Biggest Scam.”

OBJECTION: Responding Party objects to this request in that it is overly broad and neither relevant to Plaintiff’s defamation claims in this matter nor reasonably calculated to lead to the discovery of admissible evidence. Specifically, Responding Party’s December 16, 2022 YouTube video is not a basis for any of Plaintiff’s defamation claims, and neither are any statements made to Jeffrey Levin, and any such defamation claims are time-barred. *See* Tex. Civ. Prac. & Rem. Code § 16.002(a).

REQUEST FOR ADMISSION NO. 19: Admit that you reviewed the CryptoZoo Official Whitepaper prior to publishing your September 10, 2021 YouTube video titled, “Exposing Logan Paul’s New Crypto ‘Art’.”

OBJECTION: Responding Party objects to this request to the extent that the term “reviewed” is vague and ambiguous.

RESPONSE: Subject to and without waiving the foregoing objection, Responding Party admits that he read through some or all the CryptoZoo Official Whitepaper prior to publishing the September 10, 2021 YouTube video titled, “Exposing Logan Paul’s New Crypto ‘Art,’” but cannot recall details as to the level of specificity or thoroughness of the same.

REQUEST FOR ADMISSION NO. 20: Admit that you stated in your September 10, 2021 YouTube video titled “Exposing Logan Paul’s New Crypto ‘Art’” that you had “preconceived notions” about Logan Paul.

OBJECTION: Responding Party objects to this request as being taken out of its full context. Responding Party refers to D000100 for a full and complete expression of its terms.